

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

JULY R. CARLAN,)
AKA, SHAPE SHIFTER;)
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)
)
Plaintiff,)
)
)
)
v.)
)
)
)
)
)
FENWAY COMMUNITY HEALTH)
CENTER, INC.;)
)
)
Defendant.)
)

Case No. 1:23-cv-12361-MJJ

**MOTION FOR WITHDRAWAL AND SUBSTITUTION
OF COUNSEL FOR PLAINTIFF**

COME NOW, movants Samuel P. Blatchley of Eckland & Blando LLP, and Mitra N. Forouhar admitted *pro hac vice*, pursuant to District of Massachusetts Local Rule 83.5.2(c), hereby request that the Court grant the withdrawal and substitution of local counsel of record for Plaintiff July R. Carlan, and in support thereof, respectfully shows the Court as follows:

1. Samuel P. Blatchley of Eckland & Blando LLP currently represents Plaintiff July R. Carlan as local counsel of record in the above captioned matter.
2. Mitra N. Forouhar, admitted *pro hac vice* on October 13, 2023, also currently represents Plaintiff Carlan.
3. Counsel Blatchley intends to withdraw in the above captioned matter and substitute Ryan P. McLane in his place:

Ryan P. McLane
BBO #697464
McLane & McLane, LLC
269 South Westfield Street
Feeding Hills, MA 01030
ryan@mclanelaw.com

4. Currently, a motion is pending the above-captioned matter. Pursuant to District of Massachusetts Local Rule 83.5.2(c), because a motion is pending, leave of court is required for withdrawal of Counsel Blatchley.
5. Plaintiff Carlan consents and wishes to continue his claim with Ryan P. McLane as local counsel of record in substitution for Samuel P. Blatchley of Eckland & Blando LLP, and with Mitra N. Forouhar as counsel admitted *pro hac vice*.
6. Accordingly, and with the consent of Plaintiff and each of the aforementioned attorneys, Plaintiff moves to withdraw the respective appearance of Samuel P. Blatchley as local counsel of record for Plaintiff.

WHEREFORE, movants respectfully request that the Court withdraw Samuel P. Blatchley of Eckland & Blando LLP as local counsel of record for Plaintiff and grant Ryan P. McLane as local counsel of record for Plaintiff.

Respectfully submitted,

July R. Carlan

By his Attorneys,

Dated: February 27, 2024

/s/ Mitra N. Forouhar
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Admitted pro hac vice

/s/ Samuel P. Blatchley

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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2024, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Samuel P. Blatchley

Samuel P. Blatchley